

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

ELIZABETH GOODWIN, etc.,       )  
  )  
                  Plaintiff,       )  
  )  
                  v.                        )  
  )  
CITY OF CLEVELAND, et al.,       )  
  )  
                  Defendants.       )

Case No. 1:15-CV-0027  
Judge Donald C. Nugent

THE DEPOSITION OF OFFICER STEPHEN MCGRATH  
FRIDAY, FEBRUARY 26, 2016

The deposition of OFFICER STEPHEN MCGRATH, a witness, called for examination by the Plaintiff, under the Federal Rules of Civil Procedure, taken before me, Kristine M. Esber, a Notary Public in and for the State of Ohio, pursuant to notice, at Cleveland City Hall, Department of Law, 601 Lakeside Avenue, Cleveland, Ohio, commencing at 10:52 a.m., the day and date above set forth.

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OBJECTIONS BY

MR. BACEVICE

13, 14(3), 16(2), 21, 23, 27,  
29(2), 33, 35, 42, 44(3), 45

MS. BUNGARD

16, 23

- - -

1 OFFICER STEPHEN MCGRATH

2 a witness, called for examination by the Plaintiff,  
3 under the Rules, having been first duly sworn, as  
4 hereinafter certified, deposed and said as follows:

5 CROSS-EXAMINATION

6 BY MR. MALIK:

7 Q. Officer, my name is David Malik. This is Al  
8 Gerhardstein. We represent Tanesha Anderson's family  
9 and estate.

10 The questions I have for you today, they're  
11 pretty fundamental, but they're questions that we need  
12 verbal answers to so that we can get it into the  
13 record.

14 The way I handle depositions, I don't really  
15 have trick questions. I'm not in that business. I  
16 just want straightforward information. And if there's  
17 something that you are unclear about in terms of my  
18 question, just ask me and I'll rephrase it.

19 Have you ever had your deposition taken before?

20 **A. Yes.**

21 Q. In what type of case?

22 **A. A civil case.**

23 Q. And can you tell me a little bit about that  
24 case?

25 **A. It was a case that I was deposed for for my**

1     **previous employer.**

2     Q.     Anything to do with police work?

3     A.     **No.**

4     Q.     Can you tell me a little bit about your  
5 background in terms of your work experience?

6     A.     **I was hired by Cleveland on March 3rd, 2014.**

7     Q.     Prior to working for Cleveland who did you work  
8 for?

9     A.     **I worked for a company called All Metal Sales.**

10    Q.     And what did you do for them?

11    A.     **Logistics and quality.**

12    Q.     And is Cleveland the first law enforcement job  
13 you've had?

14    A.     **Yes.**

15    Q.     Did you go through the Cleveland Police Academy?

16    A.     **Yes.**

17    Q.     What was your graduation date?

18           Was it in 2014?

19    A.     **Yes. It was August 2014.**

20    Q.     We have an exhibit, Exhibit 6 -- do you have it  
21 over there -- that I want to ask you some questions  
22 about.

23           Now, the questions I ask you might sound pretty  
24 basic, but the answers are going to be important. 1372  
25 Ansel Road, what district is that in?

1     **A.       1370 -- you said 1370?**

2     Q.       1372.

3     **A.       72.**

4     Q.       Tanesha Anderson's.

5     **A.       It should be district three.**

6     Q.       Within the Third District is there more than one  
7     police station?

8     **A.       Yes and no.**

9                   MR. BACEVICE:                                 David,  
10                                 headquarters is in the district, too.

11    **A.       Headquarters is in the Third District. You have**  
12    **the old one on Payne prior to us moving to the new**  
13    **district. You have the new district, and then you have**  
14    **the old district is still owned by the City of**  
15    **Cleveland, so --**

16    Q.       So in November of 2014 what location were you  
17    working at?

18    **A.       I was working at the district located at about**  
19    **105th and Chester.**

20    Q.       Now, there are various zones in the districts,  
21    correct?

22    **A.       Correct.**

23    Q.       And how many zones are there in the third -- or  
24    were there in the Third District in November of 2014?

25    **A.       Seven.**

1 Q. And of those seven zones, how many officers are  
2 assigned to each zone?

3 A. It varies.

4 Q. Do you know how the zones are divided up?

5 A. As far as manpower, or as far as geographically?

6 Q. First as far as manpower.

7 A. It varies day by day, shift by shift.

8 Q. Who determines the manpower for each zone?

9 A. Well, there would be a car plan that comes down  
10 from the commander and the captain. And then based  
11 upon your monthly car -- they have to fill it based  
12 upon -- personnel that sits in those cars is determined  
13 by the lieutenant and the sergeants. And then day by  
14 day if a lieutenant is there, he would make the  
15 decisions upon the next schedule, or the officer in  
16 charge.

17 Q. So is the car plan an administrative decision?

18 A. Yes.

19 Q. And when you have a car plan, does that also  
20 designate the number of officers that are going to be  
21 in that zone?

22 A. Yes.

23 Q. And is that a number that changes on a daily  
24 basis?

25 A. Yes.

1 Q. So this car plan, did you say it's made out for  
2 a period of time for a month?

3 A. Yes. Well, you have a monthly car plan that  
4 comes out, but you also have a required car plan that's  
5 sent down from the commander and the captain that would  
6 be given to the lieutenant that says you're required to  
7 have X number of cars on the road and X zones for  
8 different shifts. And then once the lieutenant gets  
9 it, he makes a monthly car plan based upon his  
10 personnel and what they have going on as far as  
11 training, whatnot.

12 Q. All right.

13 A. And people on vacation.

14 Q. So you're actually going to where I want to get  
15 to. The car plan determines the number of people in  
16 the zone, correct?

17 A. Yes.

18 Q. The number of officers working in the zone?

19 A. Yes.

20 Q. Does it also determine the types of officers  
21 working in the zone; for example, X number of patrol  
22 officers, X number of sergeants, X number of  
23 lieutenants?

24 A. You would have -- well, it varies based upon the  
25 manpower, the district. But like, for example, I



1 currently work night shift, so we would have a  
2 lieutenant -- we have one lieutenant. When he's  
3 working we have a lieutenant who does administrative  
4 stuff and also comes on the road to assist. And then  
5 we have two sergeants and they split the district.

6 Q. Does the car plan also determine how many CIT  
7 officers would be in the district?

8 A. I don't know how they go about doing that.

9 Q. Do you as a patrol officer, are you made aware  
10 of who the CIT officers are in the district?

11 A. You do. Yeah.

12 Q. How do you know?

13 A. It could be on the schedule. You could hear it  
14 on the radio. You could have a conversation with  
15 somebody. You could have been through CIT training  
16 with them if you went to it.

17 Q. Is there a list of CIT officers for each  
18 district?

19 A. I don't know.

20 Q. Is there --

21 A. I'm sure they have one, the supervisor.

22 Q. Do you have the ability as an officer to call  
23 for a CIT trained officer?

24 A. Absolutely.

25 Q. And tell me about that process. How does that

1 work?

2 **A. You just request it on radio or ask the**  
3 **supervisor to advise me of you want a CIT officer.**

4 Q. Have you ever made that request?

5 **A. Absolutely.**

6 Q. And have you made the request for more than one  
7 CIT trained officer?

8 MR. BACEVICE: I'm sorry.

9 At the time or the incident?

10 MR. MALIK: At the  
11 time.

12 **A. More than one to respond to the scene of a**  
13 **crime?**

14 Q. M-hm.

15 **A. We've had more than one CIT on scene at once.**  
16 **Yes.**

17 Q. So is one CIT officer able to get on the radio  
18 and ask for another CIT officer to assist?

19 **A. Absolutely.**

20 Q. And have you known that to be done?

21 **A. Yeah. People assist each other all the time.**  
22 **It doesn't have to be a CIT incident. It could be any**  
23 **call on the road. If you're open and you're close, you**  
24 **assist other officers.**

25 MR. BACEVICE: Officer, I

1 platoon we're on. It represents whether we're early on  
2 that platoon or late on that platoon. And it  
3 represents the zone you're in and the district you're  
4 in.

5 Q. So what does the Number 3 mean?

6 A. The district.

7 Q. And what does the A mean?

8 A. It would mean you're an early car and you're a  
9 two-man car.

10 Q. And the 25?

11 A. The 2 would be the platoon, so it would be  
12 second platoon or B platoon. And 5 would be the zone.

13 Q. On November 12th of 2014 how long had you been  
14 an officer?

15 A. Since August 2014.

16 Q. And during that period of time did the vehicles  
17 you use have first aid kits in them?

18 A. I don't recall.

19 Q. Well, the city didn't provide police officers  
20 first aid kits for vehicles, did they, in November of  
21 2014?

22 MR. BACEVICE: Objection.

23 A. Yeah. I don't know when they started providing  
24 them. They came out in phases.

25 Q. If I wanted to know whether or not a vehicle had

1 a first aid kit in it, who would I ask for that  
2 information?

3 MR. BACEVICE: Objection.

4 MS. BUNGARD: You can  
5 answer if you know.

6 **A. You'd have to contact the representative from**  
7 **the department.**

8 Q. And who would that be --

9 MR. BACEVICE: Objection.

10 BY MR. MALIK:

11 Q. -- for the Third District?

12 **A. I think you'd contact the public information**  
13 **officer for the department.**

14 Q. Well, who makes the decision about how to supply  
15 the vehicle with the equipment it needs?

16 MR. BACEVICE: Objection.

17 **A. The command staff. I don't know.**

18 Q. Are there items in the trunk that you have to  
19 inventory?

20 **A. Yes.**

21 Q. And is there an actual inventory sheet for each  
22 vehicle?

23 **A. I don't know how they go about doing that. It's**  
24 **handled in the OIC's office.**

25 Q. How do you inventory what's in the vehicle?

1     **A.       I document it on my daily duty.**

2     Q.       And do you go through the trunk and document  
3     what's in the trunk?

4     **A.       Yeah. That's what I would be documenting on my**  
5     **duty. Yes.**

6     Q.       So on your daily duty form, if there was a first  
7     aid kit in there, it would be on your daily duty form?

8     **A.       It should be. Yes.**

9     Q.       And if there was a blanket, for example, in  
10    there, it would be on your daily duty form?

11    **A.       A blanket? M-hm. Sure.**

12    Q.       Do you ever remember receiving a blanket, for  
13    example, as part of the equipment that you had in your  
14    vehicle?

15    **A.       What kind of blanket are you --**

16    Q.       A blanket to cover somebody if they were on the  
17    ground, for example.

18    **A.       No.**

19    Q.       With respect to the first aid kits, do you know  
20    what would be in the first aid kit?

21    **A.       The ones we currently have?**

22    Q.       The ones that you would have had in November of  
23    2014, if you had one.

24    **A.       I know what we have in the ones that we**  
25    **currently have. Yes.**

1 Q. So would the answer be that if you had had one  
2 in 2014, you don't know what would have been in it?

3 **A. If I would have had one, I'm sure I would have**  
4 **known what was in it. Yes.**

5 Q. So is that saying most likely you didn't have  
6 one?

7 MR. BACEVICE: Objection.

8 MS. BUNGARD: Objection.

9 **A. I told you, I didn't know whether we had one or**  
10 **not. I know what's in the city issued first aid kits,**  
11 **though. Yes. I do know what's in the city issued**  
12 **first aid kits.**

13 Q. When did the city make it an official policy to  
14 have first aid kits?

15 MR. BACEVICE: Objection.

16 **A. I don't know.**

17 Q. When did you start receiving first aid kits  
18 since 2014?

19 **A. Can you repeat that?**

20 Q. When did you as a police officer start receiving  
21 a city issued first aid kit?

22 **A. I don't recall.**

23 Q. So did you drive here in a police car today?

24 **A. No.**

25 Q. Are you going to go to work today?

1     **A.       No.**

2     Q.       When you go to work will you expect a first aid  
3     kit in there?

4     **A.       Yes.**

5     Q.       And what will be in that first aid kit?

6     **A.       QuickHclot, chest seals, gauze. There's**  
7     **scissors in there. There's gloves.**

8     Q.       Is there an inventory list of what you have to  
9     check to see what's in that first aid kit?

10    **A.       No. The first aid kit is sealed.**

11    Q.       Okay. Do you know who the manufacturer of the  
12    first aid kit is?

13    **A.       No.**

14    Q.       Have you ever used a first aid kit?

15    **A.       Yes.**

16    Q.       Once you break the seal, do you get another  
17    first aid kit?

18    **A.       Yes.**

19    Q.       Now, you had a mobile data terminal in your car  
20    in 2014, right?

21    **A.       It was in the car we were driving that day.**

22    Q.       How would I find out what vehicle you were  
23    driving on November 12th of 2014, or you were using?

24    **A.       I would assume you would make a public records**  
25    **request.**

1 Q. Were all vehicles equipped with mobile data  
2 terminals in 2014?

3 **A. No.**

4 Q. And are they equipped with mobile data terminals  
5 today?

6 **A. All, or --**

7 Q. The ones that you use in the Third District.

8 **A. We have vehicles that are equipped with mobile  
9 data terminals. Yes.**

10 Q. And have you operated a mobile data terminal?

11 **A. Yes.**

12 Q. And can you receive information from dispatch  
13 over the mobile data terminal?

14 **A. From dispatch directly?**

15 Q. M-hm.

16 **A. No.**

17 Q. Who do you receive your information from over  
18 the mobile data terminal?

19 **A. It's from a database.**

20 Q. So there's no communication capability between  
21 dispatch and the police officer who has the mobile data  
22 terminal, correct?

23 **A. I'm not sure I understand what you're asking.**

24 Q. In the EMS system --

25 **A. M-hm.**



1 Q. -- they have the ability to connect with  
2 dispatch. You as a police officer on the street don't  
3 have that capability, correct?

4 **A. I have capability to connect with dispatch.**  
5 **Yes, I do.**

6 Q. And tell me about that. What kinds of things  
7 can you connect with dispatch about?

8 **A. About?**

9 Q. M-hm.

10 **A. Anything.**

11 Q. In 2014 could you receive, on your mobile data  
12 terminal or in any other way, the information that  
13 dispatch obtained about a call?

14 **A. Can you repeat that?**

15 MR. MALIK: Can you  
16 please reread it?

17 THE NOTARY: Question:  
18 "In 2014 could you receive, on your mobile  
19 data terminal or in any other way, the  
20 information that dispatch obtained about a  
21 call?"

22 **A. I cannot receive information from dispatch on my**  
23 **mobile data terminal. No.**

24 Q. But when you said you could communicate with  
25 them, how could you communicate with them?

1     **A.       By radio in the car or my cellular telephone.**

2     Q.       Have you ever had an instance where you  
3     received -- well, let's go back for a minute.

4             You don't communicate directly with dispatch,  
5     correct?

6     **A.       I do communicate directly with dispatch.**

7     Q.       But you don't communicate directly with dispatch  
8     about specific calls, for example, for a mental health  
9     call?

10    **A.       Yes.   I communicate with dispatch.**

11    Q.       Tell me what that communication is like, what it  
12    entails.

13    **A.       I will communicate with dispatch by the radio in  
14    the zone car and/or by cellular telephone.**

15    Q.       So let's say, for example, when you're  
16    dispatched to 1372 Ansel Road for a mental health  
17    call, --

18    **A.       M-hm.**

19    Q.       -- what information could you get prior to going  
20    to that call?

21    **A.       Any information that dispatch has.**

22    Q.       And you would get that by calling them?

23    **A.       On the radio.   Yes.**

24    Q.       Is that something that's done frequently or  
25    infrequently by Cleveland police officers where they

1 call dispatch direct?

2 MR. BACEVICE: Objection.

3 **A. With the radio?**

4 Q. Yeah.

5 **A. That's how we get all of our assignments.**

6 Q. Tell me how you get an assignment. Tell me the  
7 procedure to get an assignment.

8 **A. Radio will call your call number, as we**  
9 **discussed earlier, over radio.**

10 Q. M-hm.

11 **A. You would answer. And then she would give you a**  
12 **location, description of the incident, a code, a CAD**  
13 **number. And usually they provide you with as much**  
14 **information as they have.**

15 **But radio is also gaining further information**  
16 **after that oftentimes.**

17 Q. Now, those radio calls, are those radio calls  
18 recorded?

19 **A. I would assume so. It's not my responsibility.**

20 Q. So then if there was additional information that  
21 an officer needed about a call, there should be a  
22 recorded radio call, correct?

23 **A. If that information is available.**

24 Q. Okay. Let's look directly at Exhibit 6. I want  
25 to clarify the meaning of some of the things on here.

1 Do you see where it says incident number right below  
2 the broken dotted line?

3 **A. Yes.**

4 Q. Is that the CAD number?

5 **A. Yes.**

6 Q. And when it says ORI number, what does that  
7 mean?

8 **A. That's the agency's identification number.**

9 Q. When it says nature of call MNTL FM disturbing,  
10 what does that mean?

11 **A. I would identify it as mental female disturbing.**

12 Q. What does that mean to you as an officer?

13 **A. To me as an officer it would be a person with  
14 some level -- unknown level of mental possible  
15 disorder, a female and she's disturbing.**

16 Q. What does disturbing mean to you?

17 **A. She's disturbing other persons. The nature of  
18 the disturbance is unknown.**

19 Q. When it says incident type, it says MNTL P and  
20 then a star. Mental, what does that mean?

21 **A. I do not know.**

22 Q. Do you know what the P means?

23 **A. I do not know. No.**

24 Q. Let's go down to the lines below. When it says  
25 call, what does call mean?

1     **A.       I would assume that that is the time dispatch**  
2     **received the call.**

3     Q.       And when it says dispatch, what does that mean?

4     **A.       I would assume that is the time that the car**  
5     **that was given the assignment received the call.**

6     Q.       So in this case the call would have been  
7     received by dispatch at 20:13:10, and then you would  
8     have received the assignment at 20:34:58, correct?

9     **A.       Correct.**

10    Q.       Do you have an explanation for the 20 minute or  
11    so delay in dispatch?

12                   MR. BACEVICE:                               Objection.

13                   MS. BUNGARD:                               Objection.

14                               If you can, answer.

15    **A.       No.   I don't have any involvement in that.**

16    Q.       All right. Let's go to arrive 1. What does  
17    that mean?

18    **A.       It's, again, assuming that that would be the**  
19    **time of arrival to the car that received the**  
20    **assignment.**

21    Q.       Would that be arrival at 1372 Ansel?

22    **A.       The location of the assignment.   Yes.**

23    Q.       All right. And clear, 21:59:45, would that be  
24    the time you leave?

25    **A.       Yeah.   It sounds about right.**

1 Q. All right. So just to get in the record,  
2 though, the arrival time would be 21:31:48, correct?

3 Am I reading that correctly?

4 **A. Yes.**

5 Q. Now, it says section, zone 35 and beat 35. Do  
6 you know what those mean?

7 **A. Yeah, I guess.**

8 Q. What does zone 35 mean?

9 **A. It means we're in District 3, Zone 5.**

10 Q. And what does beat 35 mean, the same thing?

11 **A. Yeah. District 3, Zone 5.**

12 Q. Where it says grid, what does Ward 7 mean?

13 **A. Ward 7 of the city.**

14 Q. That's like a political ward?

15 **A. M-hm.**

16 MS. BUNGARD: You have  
17 to say yes or no.

18 THE WITNESS: What?

19 MS. BUNGARD: You have  
20 to say yes or no.

21 **A. Yes.**

22 Q. Let's go down to where it said received ORI/ID.  
23 Do you know what that means?

24 **A. No.**

25 Q. Do you know what dispatch ORI/ID means?

1       **A.**       **No.**

2       **Q.**       Do you know what dispatch shift means?

3       **A.**       **No.**

4       **Q.**       Do you know what source 1234 means?

5       **A.**       **No.**

6       **Q.**       Do you know what report required no means?

7       **A.**       **No.**

8       **Q.**       Do you know what disposition ADV means?

9       **A.**       Once again, with all of this I'm assuming,  
10       because this is not a report that I generated or a  
11       report that we regularly generate in the car.

12               So you're asking me to give you answers  
13       regarding a report that I am assuming is generated by  
14       radio dispatch, which is part of their job. I am not a  
15       dispatcher. I do not type up such reports.

16       **Q.**       Okay.

17       **A.**       So if you're asking me about my duty -- my daily  
18       duty that I believe I was typing on this day, I may be  
19       able to answer more questions regarding the content on  
20       there.

21               Regarding the content on here, you're asking me  
22       questions that I'm just ultimately assuming that I know  
23       what they mean. But you're asking me to perceive what  
24       someone else's job entails, and I'm not a dispatcher.

25       **Q.**       Okay. That's fair enough.

1       **A.       Okay.**

2       Q.       This is not -- would you agree with me that  
3       understanding what the information is on this document,  
4       this Exhibit 6, --

5       **A.       Uh-huh.**

6       Q.       -- it's not something that you're trained on by  
7       the city, correct?

8       **A.       No.**

9       Q.       Is that correct?

10      **A.       That's correct.**

11      Q.       Let's go to priority, though. Having said all  
12      of that, see where it says 3?

13      **A.       M-hm.**

14      Q.       What's a priority 3?

15      **A.       In regards to my responsibilities a priority 3**  
16      **would be the level that the priority of -- the priority**  
17      **level of the call that you're receiving.**

18      Q.       And how many priority levels are there?

19      **A.       Generally we have four.**

20      Q.       And can you explain what each one is?

21      **A.       1 and 2 -- 1 is the highest. 4 would be the**  
22      **lowest. And 1 would be something regarding a violent**  
23      **crime, weapons, an accident on the freeway, a bad**  
24      **accident where -- ultimately it would be something**  
25      **where there's a threat of bodily harm to somebody.**



1 Q. So who determines the priority level?

2 A. **I believe the supervisor in the dispatch.**

3 Q. The supervisor in the Third District?

4 A. **In dispatch.**

5 Q. Supervisor in dispatch. Okay. Do you know who  
6 K. Kelley 1 is where it says cleared by?

7 A. **No.**

8 MR. MALIK: Can we  
9 mark this as --

10 MR. BACEVICE: 7.

11 MR. MALIK: -- 7?

12 (Thereupon, Plaintiff's Exhibit 7 to  
13 the deposition of OFFICER STEPHEN MCGRATH  
14 was marked for identification.)

15 MR. BACEVICE: David, can  
16 you note an objection to this?

17 And can I have a standing objection  
18 to questions based on this report?

19 MR. MALIK: Sure.

20 MR. BACEVICE: Thanks.

21 BY MR. MALIK:

22 Q. Does Exhibit 7 look familiar to you?

23 A. **No.**

24 Q. Do you see any signatures at the bottom of the  
25 page?

1 Do you see signatures at the bottom of the page?

2 **A. Yes.**

3 Q. Do you know whose signatures those are?

4 **A. No.**

5 Q. You've seen this type of document before,  
6 though, right?

7 **A. Yes.**

8 Q. So let's go through it. Okay?

9 Where it says zone 5, what does that mean?

10 **A. It would be the zone.**

11 Q. And would it be a zone in the Third District?

12 **A. If this duty came from an officer working in the**  
13 **Third District, yes.**

14 Q. Is there any way to tell if this came from the  
15 Third District?

16 **A. Yes.**

17 Q. And how could you tell?

18 **A. If you look at the radio call number.**

19 Q. So the radio call on this is -- what does that  
20 say?

21 **A. Are you asking --**

22 Q. I'm asking you what does that say?

23 **A. It appears to be 3B35.**

24 Q. Are you saying that this is not yours?

25 **A. No. It's not mine.**

1 Q. And should there be an equivalent one of these  
2 for you?

3 **A. Yeah. We do one every day.**

4 Q. Where this one says car 315, is that the car  
5 that you were in on November 12th of 2014?

6 **A. This isn't my duty.**

7 Q. Okay. But I'm asking you, was 315 the car you  
8 were in?

9 **A. I don't recall what number car I was in.**

10 Q. How would I find out what car you were in on  
11 November 12th of 2014?

12 MR. BACEVICE: Objection,  
13 asked and answered.

14 **A. You could make a public records request.**

15 Q. Well, isn't there somebody that's a direct  
16 supervisor of yours that could answer me?

17 MR. BACEVICE: Objection.

18 **A. I don't think that's how things are handled,  
19 but I don't know.**

20 Q. Who assigned you the car?

21 **A. The officer in charge.**

22 Q. And who was the officer in charge on November  
23 12th of 2014?

24 **A. I don't recall.**

25 Q. All right. Let's look at this report, though,

1 Q. Who runs the roll call?

2 A. Supervisor, sergeant.

3 Q. And who would the sergeant have been in November  
4 of 2014?

5 A. I don't recall.

6 Q. Does the sergeant, is he the one that reviews  
7 your duty reports?

8 A. A sergeant will review your duty report. Yes.

9 Q. And when your duty reports are reviewed, what  
10 are they reviewed for?

11 A. Consistency, making sure that things are  
12 documented properly so that you understand what's going  
13 on, time between calls, make sure you're accounted for  
14 your time throughout your shift, mileage, make sure you  
15 document your shotgun number, first aid kit number,  
16 your trauma kit number, ammo box number, damages on the  
17 vehicle.

18 Pretty much everything that you find on a duty  
19 report, your sergeant is going to review. He's going  
20 to review that you signed it. He's going to review the  
21 number of arrests, citations issued, parking  
22 infractions issued, number of assignments, due for  
23 service mileage, due for service date, the sticker, gas  
24 card number, vehicle number. He's required to check  
25 all of this, he or she.

1 Q. So the person that's checking this has the  
2 ability to collect data on the type of calls, correct?

3 **A. Yeah.**

4 Q. And were you familiar in 2012 --

5 MR. BACEVICE: '14.

6 BY MR. MALIK:

7 Q. Excuse me. -- 2014 with any type of data  
8 collection and analysis that went on with respect to  
9 the duty report?

10 MR. BACEVICE: Objection.

11 **A. We have data analysis. We have crime stats that**  
12 **come out every month, monthly.**

13 Q. I know, but my question is more specific to the  
14 duty reports.

15 **A. I don't know.**

16 Q. You've never heard anybody talk about analyzing  
17 duty reports, correct?

18 MR. BACEVICE: Objection.

19 **A. It's not our responsibility.**

20 Q. But you're not even aware whether or not duty  
21 reports are analyzed for the information contained in  
22 them, correct?

23 MR. BACEVICE: Objection.

24 **A. They are. We do keep stats on --**

25 Q. And when did that start?

1       A.       Before I started on the job. Before I was  
2       hired.

3       Q.       How do you know that?

4       A.       Because I've worked in the office and the office  
5       staff gets a copy of the duties and keeps stats of who  
6       did what for each day throughout the year.

7       Q.       And is that put into a computer?

8       A.       No. Ours is not. But I cannot speak for every  
9       district and every platoon. I work C platoon and I  
10      know how C platoon operates.

11      Q.       So when you say they keep stats, what does that  
12      mean, that they write things down about duty reports?

13      A.       Yeah. They take a -- they take a record of, you  
14      know, how many calls you received, how many reports you  
15      did, tickets written, arrests, various types of  
16      tickets, noise, seat belts, misdemeanor citations  
17      issued, open containers, misdemeanor arrests, felony  
18      arrests.

19      Q.       So there should be some type of record of all  
20      calls that had to do with mental health calls?

21                      MR. BACEVICE:                      Objection.

22      A.       It doesn't -- the specific stats we keep for our  
23      shift do not identify the type of call. They identify  
24      the things I just listed, reports, tickets issued,  
25      arrests, calls responded to, the number of calls.